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DOE ORDER #

3 RF 12677



EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

October 13, 1993

93-RF-12677

Richard J. Schassburger
Acting Director
Environmental Restoration Division
DOE, RFO

Attn: B. K. Thatcher



RECOMMENDED FIELD APPROACH CHANGES FOR THE INDUSTRIAL AREA ENVIRONMENTAL EVALUATION - WSB-424-93

EG&G Rocky Flats, Inc. (EG&G Rocky Flats) Remediation Project Management (RPM) is recommending a format change for the Environmental Evaluation Technical Memorandum - Addendum to Final Phase I RCRA [Resource Conservation and Recovery Act] Facilities Investigation/Remedial Investigation (RFI/RI) Work Plan for Operable Unit (OU) 9 dated June 1992. The Technical Memorandum for OU 9 is also known as the Industrial Area (IA) Environmental Evaluation (EE) which is being implemented through Operable Unit 8 - 700 Area. The IA EE format changes (see attached outline) are in accordance with guidelines proposed by the Environmental Protection Agency (EPA) in their Framework for Ecological Risk Assessment (EPA 1992).

The EPA guidance provides for a three-phased approach for conducting ecological risk assessment consisting of 1) Problem Formulation, 2) Analysis, and 3) Risk Characterization. This three-phased approach has been developed in conjunction with EG&G Rocky Flats, the Department of Energy, Rocky Flats Office (DOE, RFO), and the regulatory agencies since April 1993. Also, the three-phased approach is currently being applied to EEs for other OUs (e.g. 3, 7, and 11). EG&G Rocky Flats Ecology and NEPA [National Environmental Policy Act] Division (END) has advised RPM that the three-phased approach is the most current and approved approach for implementing EEs at Rocky Flats.

The IA EE is being implemented to comply with the technical scope of the OU 9 EE Technical Memorandum (TM). The three-phased approach will still fulfill all of the objectives and data collection criteria as specified in the OU 9's EE TM. The phased approach helps to present the EE in a more logical and efficient format. Following each phase described in the outline, presentations will be given to DOE, RFO and the regulatory agencies, and an informal review process will be established.

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Richard J. Schassburger

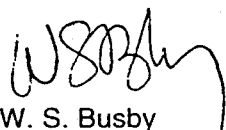
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The process leading to the three-phased EE is well documented through OU 3. However, RPM is requesting that DOE, RFO obtain written documentation/approval from EPA and the Colorado Department of Health (CDH) that this three-phased approach can be used for the IA EE.

If you have any questions or require additional information regarding this matter, please contact B. D. Peterman of Remediation Project Management at extension 8659.



W. S. Busby

Acting Director

ERM/Remediation Project Management

EG&G Rocky Flats, Inc.

BDP:dmf

Orig. and 1 cc - R. J. Schassburger

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